

EXHIBIT 13

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION
Case No. 3:21-md-02981-JD
-----x

4 IN RE GOOGLE PLAY STORE
5 ANTITRUST LITIGATION
6 THIS DOCUMENT RELATES TO:
Epic Games Inc. v. Google LLC, et al.,
Case No: 3:20-cv-05671-JD

7
8 In re Google Play Consumer
Antitrust Litigation,
Case No: 3:20-cv-05761-JD

9
10 In re Google Play Developer
Antitrust Litigation,
Case No: 3:20-cv-05792-JD

11
12 State of Utah, et al., v.
Google LLC, et al.,
Case No: 3:21-cv-05227-JD

13
14 Match Group, LLC, et al.,
v. Google LLC, et al.,
Case No. 3:22-cv-02746-JD

15 -----x
16 Tuesday, August 23, 2022
17 9:16 a.m. PDT

18 **HIGHLY CONFIDENTIAL
19 UNDER PROTECTIVE ORDER**
20 - Volume I -

21 Remote Videotaped Deposition by
22 Virtual Zoom of DONALD HARRISON, a
23 Witness on behalf of Google, taken before
24 Dawn Matera, a Certified Shorthand
25 Reporter and Notary Public of the State
of New York.

1 DONALD HARRISON - HIGHLY CONFIDENTIAL

2 and I am the videographer. The court
3 reporter is Dawn Matera from the firm
4 of Veritext Legal Solutions.

5 I am not authorized to
6 administer an oath. I am not related
7 to any party in this action nor am I
8 financially interested in the outcome.

9 Please note that all appearances
10 and affiliations will be noted on the
11 stenographic record and will the court
12 reporter please swear in the witness
13 remotely.

14 D O N A L D H A R R I S O N, the
15 Witness herein, having first been duly
16 sworn by the Notary Public, was examined
17 and testified as follows:

18 EXAMINATION BY

19 MR. SCHWARTZ:

20 Q. Good morning, Mr. Harrison. My
21 name is Aaron Schwartz and I will be
22 asking you questions today on behalf of
23 the consumer class.

24 Can you please state your full
25 name for the record, please.

1 DONALD HARRISON - HIGHLY CONFIDENTIAL
2 on global partnerships, there is a period
3 of time where another executive named
4 Daniel Alegre managed the relationship
5 with Apple, together with Joan Braddi. I
6 wanted to say that lasted for a bit
7 longer than a year and then I took over
8 top partners and at that point started
9 managing Apple.

10 Q. Okay. In terms of the
11 financial impact on Google, the money
12 flowing one way or the other, is Apple
13 considered Google's largest partner?

14 A. In terms of the flow of funds,
15 in terms of the value of the commercial
16 relationship between the parties, Apple
17 is our largest partner.

18 Q. And how long has Google
19 considered Apple a partner?

20 A. I am sure we considered Apple a
21 partner since whenever we did the first
22 distribution deals that saw Search appear
23 on Apple surfaces, which probably goes
24 all the way back to 2006/2005. Possibly
25 earlier. I am not aware.